



CN 028
Trenton, N.J. 08625-0028

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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
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Hazardous Waste Operations

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Deputy Director
Responsible Party Remedial Action

12/20/89
(DATE)

MEMORANDUM

TO: Distribution List *DBK*
THROUGH: *B. Kanjarpane P.E.* Section Chief
Bureau of Federal/State Case Management
FROM: *E.G. Kamp P.E.* Case Manager
Bureau of Federal/State Case Management
CASE: *LE Carpenter*
CASE COMPONENT: *Remedial Action*
SUBJECT: *Interior Decommissioning Plan*

The attached type of document on the above named facility is for your:

- ☒ Review and comment
[] Information and/or file
[] Action
[] Other

Should you have any questions or if you are unable to meet the due date, please contact me at 3-1455.

Due Date: 1/5/90

Activity Code: EGK-5

Attachment

345984



Distribution:

FYI
ONLY

*Comments received by
Case Manager on

[]	_____	, Geologist Division of Water Resources	_____
[]	<u>J. Boyer</u>	, Technical Coordinator BEERA/Division of Hazardous Site Mitigation	_____
<input checked="" type="checkbox"/>	<u>P. Brass</u>	, Regulatory Officer Division of Regulatory Affairs	_____
[]	_____	, Assistant Director Division of Regulatory Affairs, Enforcement Element	_____
[]	_____	, Bureau of Community Relations	_____
[]	_____	, Division of Solid Waste	_____
[]	_____	, Division of Environmental Quality	_____
<input checked="" type="checkbox"/>	<u>J. Josephs</u>	, USEPA	_____
[]	_____	, DAG	_____
[]	<u>Erin Fox</u>	EEBA	_____
[]	_____		_____

*Document received from EPA/RP on
Scheduled Actual

*Response sent to
EPA/RP on

*This information is filled out by the Case Manager and a copy of the completed memorandum is forwarded to the Section Chief and MIS.

c. Section Chief (no attachments)
 MIS (no attachments)

December 13, 1989

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
401 E. State Street, CN-028
Trenton, NJ 08625

ATTN: Ed Kaup

SUBJ: Interior Decommissioning Plan
L.E. Carpenter & Company
Wharton, New Jersey

Dear Ed:

In response to the New Jersey Department of Environmental Protection (NJDEP) letter, dated October 27, 1988, requiring L.E. Carpenter to undertake cleanup of building interiors at the Wharton site, the following presents a plan for addressing the points raised concerning the facility interior. Items detailed under the heading "Exterior" in the October 27, 1988 letter have been addressed in the Report of Investigation Findings submitted in November 1989. The letter addresses each of the items discussed in the October 27, 1988 letter under the heading "Interior": (1) process piping, (2) asbestos insulation and (3) disposal documentation. In addition, the proposed schedule for the cleanup activities is presented.

1. Process Piping and Drains

Process piping exists primarily in Buildings 13 and 14. All overhead piping not associated with emergency sprinkler systems will be checked for the presence of residual raw materials. If any raw materials are present, they will be sampled and analyzed to determine if they are hazardous. If materials within the process piping are determined to be hazardous, all of the affected pipes and hazardous waste material will be disposed of in compliance with applicable laws, after evaluating the most effective decontamination methods.

All drains utilized in the interiors of the buildings have been addressed in the Remedial Investigation. Accordingly, no sampling or analysis is proposed to address existing floor drains at the facility. Sampling performed in accordance with the April 1988 Sampling Plan for known floor drains is discussed in the November 1989 Report of Remedial Investigation Findings.

2. Asbestos Insulation

L.E. Carpenter will hire a New Jersey licensed asbestos removal contractor to inspect the site interiors and assess the extent of asbestos insulation. Any insulation that is not completely immobilized will be addressed by the asbestos removal contractor in accordance with New Jersey law.

3. Documentation Demonstrating Removal of All Hazardous Substances. Process Materials and Waste from the Site

At the completion of the interior decommissioning work, L.E. Carpenter will provide documentation demonstrating that all hazardous substances, process materials, and wastes requiring removal have been removed from the site.

Areas in Building 9, including the silk vault, which exhibit deposits of residual waste material, ink staining or other raw materials associated with former L.E. Carpenter operations will be sampled and analyzed to determine if the areas contain hazardous materials. If hazardous materials are present, they will be removed and containerized for disposal in accordance with applicable New Jersey regulations.

Schedule

L.E. Carpenter will commence interior decommissioning and cleanup activities in a particular building prior to leasing the available space. If the site is to be sold or if there is a transfer of ownership title, all the building interiors will be decommissioned and cleaned in advance of the closing date.

In view of the current "broom clean" condition of the interiors, L.E. Carpenter does not propose to commence any of the cleanup or decommissioning activities until the buildings are leased or the site is sold. None of the interiors formerly used during L.E. Carpenter manufacturing activities are currently in use and there are no immediate plans for their occupation. Accordingly, there is no threat or danger to humans from any of the conditions present inside the building.

If you have any questions, please call.

Sincerely,

GEOENGINEERING, INC.



William W. Dunnell IV
Project Manager

WWD/avm

cc R. Hahn
C. Anderson
M. Rodburg